

1 Therese M. Shanks, Esq. (SBN 12890)
2 Wade Beavers, Esq. (SBN 13451)
3 Kendall M. Lovell, Esq. (SBN 15590)
4 MaryJo E. Smart, Esq. (SBN 16139)
5 FENNEMORE CRAIG, P.C.
6 7800 Rancharrah Parkway
7 Reno, Nevada 89511
8 Tel: 775-788-2228 Fax: 775-788-2229
9 tshanks@fennemorelaw.com; wbeavers@fennemorelaw.com;
10 klovell@fennemorelaw.com; msmart@fennemorelaw.com

11 Andrew K. Stutzman, Esq. (PA Bar No. 72922)
12 Stradley Ronon Stevens & Young, LLP
13 2005 Market Street, Ste. 2600
14 Philadelphia, PA 19103-7018
15 Tel: 215-564-8728 Fax: 215-564-8210
16 ASTutzman@stradley.com

17 *Pro Hac Vice*

18 *Attorneys for Plaintiff*

19 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

20 INNOVATIV MEDIA GROUP, INC., a
21 Wyoming corporation,

22 Plaintiffs,
23 vs.

24 MICHAEL BEYS; RICHARD DE SILVA;
25 and FTE NETWORKS, INC., a Nevada
corporation

26 Defendants.

27 CASE NO.: 2:22-cv-01362-CDS-VCF

28 **STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME FOR
PLAINTIFF TO OPPOSE DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
[ECF 62] AND DEFENDANTS' MOTION
TO STAY DISCOVERY AND STAY OF
DISCOVERY [ECF 63]**

(First Request)

29 **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME FOR
PLAINTIFF TO OPPOSE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
AND DEFENDANTS' MOTION TO STAY DISCOVERY AND STAY OF DISCOVERY**

30 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff
31 Innovativ Media Group, Inc. ("Plaintiff") and Defendants Michael Beys, Richard de Silva and FTE
32 Networks, Inc. (collectively the "Defendants") stipulate through their undersigned counsel that
33 Plaintiff's deadline to file an opposition to Defendants' Motion for Summary Judgment filed on
34 March 28, 2023 (ECF No. 62) be extended to April 25, 2023, and Defendants' deadline to file a
35 reply in support of Defendants' Motion for Summary Judgment also be extended by two weeks to

1 May 9, 2023. Plaintiff and Defendants further stipulate through their undersigned counsel: (1) to
2 a stay of discovery until the date an order is issued on Defendants' pending Motion to Dismiss;
3 and, (2) that Plaintiffs' deadline to file an opposition to Defendants' Renewed Motion to Stay
4 Discovery filed on March 28, 2023 (ECF No. 63) is extended to a date two weeks from the date
5 the order is issued on Defendants' pending Motion to Dismiss. Defendants consent to the extension
6 of Plaintiffs' deadlines and the stay of discovery.

7 DATED this 10th day of April, 2023.

8 FENNEMORE CRAIG, P.C.

9
10 By: /s/ Therese M. Shanks
11 Therese M. Shanks, Esq. (SBN 12890)
12 Wade Beavers, Esq. (SBN 13451)
13 Kendall M. Lovell, Esq. (SBN 15590)
14 MaryJo E. Smart, Esq. (SBN 16139)
15 7800 Rancharra Parkwy
16 Reno, Nevada 89511

17 -AND-

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19 Stradley Ronon Stevens & Young, LLP
20 2005 Market Street, Ste. 2600
21 Philadelphia, PA 19103-7018
22 Tel: 215-564-8728 Fax: 215-564-8210
23 ASTutzman@stradley.com

24 *Pro Hac Vice*

25 *Attorneys for Plaintiff*

26 DATED this 24th day of April, 2023.

27 LEX DOMUS LAW

28 By: /s/ Brandi M. Planet
29 Daniel S. Cereghino, Esq. (SBN 11534)
30 Brandi M. Planet, Esq. (SBN 11710)
31 Austin M. Maul, Esq. (SBN 15596)
32 1712 Tesara Vista Place
33 Las Vegas, Nevada 89128

34 *Attorneys for Defendants*

35 **IT IS SO ORDERED.**

36 
37

38 UNITED STATES MAGISTRATE JUDGE